

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS AND VERIZON CORPORATE  
SERVICES GROUP INC.,

Defendants.

Case No. 2:23-cv-00352-JRG-RSP

**JURY TRIAL DEMANDED**

**DECLARATION OF REZA MIRZAIE IN SUPPORT OF  
PLAINTIFF HEADWATER RESEARCH LLC'S OPPOSITION TO  
DEFENDANTS' PROPOSED SIXTH MOTION *IN LIMINE***

1. I, Reza Mirzaie, declare as follows:

2. I am counsel for Headwater Research, LLC (“Headwater”) in the above-captioned matter. I provide this declaration in support of Headwater’s Motions *in Limine* (“MILs”). I have personal knowledge of the facts set forth herein, and if called upon to testified, I could and would testify competently thereto.

3. Attached as Exhibit A is a true and correct copy of excerpts from the trial transcript in *Headwater v. Samsung*, 2:23-cv-00103-JRG-RSP (E.D. Tex), dated April 23, 2025).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 8, 2025 in Los Angeles, California.

/s/ Reza Mirzaie  
Reza Mirzaie